

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAINT-GOBAIN PERFORMANCE
PLASTICS EUROPE,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA; PETRÓLEOS DE
VENEZUELA, S.A.,

Defendants.

Civil Action No.: 1:18-cv-01963-LPS

REQUEST FOR CLERK TO ENTER DEFAULT

Pursuant to Rules 55(a) of the Federal Rules of Civil Procedure, Plaintiff and Arbitration Award Creditor Saint-Gobain Performance Plastics Europe requests that the Clerk enter a default against Bolivarian Republic of Venezuela (“Venezuela”) and its alter-ego, Petróleos De Venezuela, S.A. (“PDVSA”), on the basis that the record in this case, including but not limited to the Declaration of Alexander A. Yanos (D.I. #3), and the accompanying further Declaration of Alexander A. Yanos, shows that Venezuela and its alter-ego, PDVSA, have failed to plead or otherwise defend.

Dated: April 24, 2019

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
E-mail: ljones@pszjlaw.com
pkeane@pszjlaw.com

– and –

Alex Yanos (admitted *pro hac vice*)
Carlos Ramos-Mrosovsky (admitted *pro hac vice*)
Rajat Rana (admitted *pro hac vice*)
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
Tel: 202-210-9400
Fax: 212-210-9444
Email: alex.yanos@alston.com
carlos.ramos-mrosovsky@alston.com
rajat.rana@alston.com

*Counsel for Plaintiff Saint-Gobain Performance
Plastics Europe*